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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
DLJ MORTGAGE CAPITAL, INC.,

Plaintiff,

**Case No. 07 CV 3746 (LAP)(HP)**  
ECF CASE

-against-

CAMERON FINANCIAL GROUP, INC.

Defendant.

-----X

**NOTICE OF DEFENDANT CAMERON FINANCIAL GROUP, INC.'S MOTION TO  
DISMISS PLAINTIFF'S COMPLAINT FOR  
LACK OF JURISDICTION AND IMPROPER VENUE OR  
IN THE ALTERNATIVE FOR CHANGE OF VENUE**

PLEASE TAKE NOTICE that upon the annexed certification of Carey Fierro, dated June 29, 2007 and the exhibits thereto, and upon the summons and complaint and upon all prior papers had herein, defendant Cameron Financial Group, Inc., through its attorneys, Einbinder & Dunn, LLP, will move this Court at Room 12A, United States Court House, 500 Pearl Street, New York, New York, on July 30, 2007 at 9:30 a.m., or such other date and time as may designated by the Court:

(i) pursuant to Federal Rule of Civil Procedure 12(b)(2) dismissing the complaint in its entirety, with prejudice, as a matter of law, on the ground that the Court lacks jurisdiction over the defendant; and

(iii) pursuant to Federal Rule of Civil Procedure 12(b)(3) dismissing the complaint in its entirety on the ground that venue is improper because (a) jurisdiction of the Court is invoked solely on the ground that the action is based on diversity of citizenship; (b) the defendant Cameron Financial Group, Inc., is a corporation incorporated under the laws of the State of California and is not licensed to do or doing business in the Southern District of New York; or

(iv) pursuant to 28 U.S.C. § 1404(a) transferring venue from the United States District Court for the Southern District of New York, to the United States District Court for the Central District of California; and

(v) such other and further relief as to this court may seem just and equitable.

PLEASE TAKE FURTHER NOTICE that plaintiff's answer papers, if any, shall be served in accordance with Local Civil Rule 6.1 unless the Court orders otherwise.

Defendants request oral argument of this motion.

Dated: New York, New York  
June 29, 2007

EINBINDER & DUNN, LLP

By: /s/ Michael Einbinder  
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